

APPENDIX A

PROPRIETARY RIGHTS

Pursuant to the Product Development and License Agreement dated as of the 16 day of December, 1994 (the "Agreement"), by and between ZYTEC CORPORATION, a Minnesota corporation ("Zytec"), and GALAXY POWER, INC. a Massachusetts corporation ("Galaxy"), the following is made a part thereof:

1. **DEFINITIONS.** Except as otherwise expressly set forth herein, all capitalized terms that are defined in the Agreement shall have the same meaning herein as assigned to them in the Agreement.
2. **PROPRIETARY RIGHTS.** Zytec and Galaxy agree that the following circuits and packaging techniques are unique to Galaxy and shall constitute "Proprietary Rights" within the meaning set forth in Article I of the Agreement:

[TO BE PROVIDED]

3. **COUNTERPARTS.** This Appendix may be executed in one or more counterparts, each of which shall be deemed an original, but together shall constitute one and the same instrument.

IN WITNESS WHEREOF, the parties hereto have executed this Appendix A as of the ____ day of December, 1994.

ZYTEC CORPORATION

By: _____

(Signature)

Name: _____

(Typed or Printed)

Its: _____

(Title Typed or Printed)

GALAXY POWER, INC.

By: _____

(Signature)

Name: _____

(Typed or Printed)

Its: _____

(Title Typed or Printed)

APPENDIX B

PHASE GATE 3

Phase Gate 3 Action Items

- Safety Report Written (tests performed and report by Zytec)
- CAD Design Completed
- Manufacturing Plan Completed (Zytec)
- Pre-Production Parts Ordered (Zytec)
- Burn-In Rack Built... if required (Zytec)
- Commence Safety Agency Compliance
(tests performed by Zytec, design compliance Galaxy responsibility)
 - UL, CSA, TUV
- Specification Compliance Complete
 - Customer Verification Test Complete (tests performed by Zytec)
 - Test Report/Exception Report Complete (tests performed by Zytec)
 - Strife Testing Complete (tests performed by Zytec)
 - Cpk Assessment Complete (tests performed by Zytec)
 - Pass/Fail Decision Complete (tests performed by Zytec)
- MTBF Prediction Complete (data from Galaxy, program run by Zytec)
- Material Plan for Limited Production Build Complete (Zytec)
- Product Costs Reviewed (joint)
- Engineering Documentation Released (joint)
- Phase Gate Review Completed (joint)

Action items are the responsibility of Galaxy except as noted.

APPENDIX C

PHASE GATE 4

Phase Gate 4 Action Items

- Pre-Production Units Tested (Zytec)
- Production Tooling Released (Zytec)
- Limited Production Buy Complete (Zytec)
- Burn-In Data Evaluation (Zytec)
- Pre-Production Build Start (Zytec)
- UL, CSA, TUV Safety Agency Approvals Complete (submittal Zytec, compliance Galaxy)
- Tooling/Test Equipment Complete (Zytec)
- Critical Test Parameters Defined
- Manufacturing Process and Control Complete (Zytec)
- Production Process Flow Diagram Complete (Zytec)
- Production Plan for Unlimited Production Complete (Zytec)
- Material Plan for Unlimited Production Complete (Zytec)
- Cost Target Review/Compliance to Plan Complete (joint)
- Cpk 1.5 First Article Inspection Complete (performed by Zytec)
- Initiate Production Build (Zytec)
- Phase Gate Review Complete (joint)

Action items are the responsibility of Galaxy except as noted.

GALAXY POWER Real Solutions for Distributed Power Architectures ORION SERIES Rev. x06**INPUT SPECIFICATIONS**

Parameter	Symbol	Min	Typical	Max	Units
Operating Input Voltage	V_i	36	48	75	VDC
Inrush Current	I_{inrush}			8	A pk
Inrush transient	t^2t			4	A ² s
Input Ripple Rejection (120 Hz)			60		dB
No-load input Power			1	1.5	W

OUTPUT SPECIFICATIONS

Parameter	Symbol	Min	Typical	Max	Units
VOLTAGE	V_o		3.3, 5.0 12.0, 15.0		Volts
Total Regulation (Load, line, initial, drift, temp)				2	% $V_{o,nom}$
Output Voltage Set point ($V_i = 48V$, $I_o = \text{full load}$, $T_c = 25^\circ C$)	$V_{o,set}$	99	100	101	% $V_{o,nom}$
Output Regulation Line ($V_i = 36V$ to $72V$)			0.1	0.3	%
Load ($I_o = 0A$ to $I_{o,max}$)			0.1	0.5	%
Temp. ($T_c = 0^\circ C$ to $100^\circ C$)			0.4	0.8	%
Output Ripple & Noise Voltage RMS				3.3V 5.1V 12V 15V 35 35 50 65	mV rms
Peak-to-peak (5 Hz to 20 Mhz)				100 100 150 150	mV pk-pk
V_o Margin Range ($V_o = V_{o,nom}$; $I_o = I_{o,max}$)	V_m		-35%, +20%		% V_o
Remote Sense Compensation				0.6	V

CURRENT	Symbol	Min	Typical	Max	Units
Output Current	I_o	0		75W 100W 125W 150W 25 30 15 20 25 30 6 8 10 12.5 5 7 9 10	A
Dynamic Response ($V_i = 48V$) Load change: 25% to 75% I_{max} ($di/dt = 0.1A/\mu s$)			3.3V, 5V/ 12V, 15V 150/450 200	3.3V 5.1V 12V 15V 150 150 450 450 250	mV μsec
Peak deviation					
Settling time (to 1% V_o)					
Current-sharing, Module-module @90% I_{max}			3	10	% I_{avg}

PROTECTION					
Nominal Current Limit ($V_{out} = 90\% V_o$)		105	110	120	% $I_{o,max}$
Output Short-circuit current limit			130	150	% $I_{o,max}$
Over-voltage Shutdown	V_{sd}	120	125	130	% $V_{o,nom}$
MISCELLANEOUS					
Turn-on time from enable (resistive load) ($V_i = 60V$, $I_o = I_{max}$)			10	15	ms
Isolation capacitance (500VDC)			3,000		pF
Isolation Resistance (500VDC)		10			Mohms
Operating Baseplate Temperature		-20		90	degC
Overtemperature shutdown (TBaseplate)		105	110	120	degC
Enable Low (V_{IL} , I_{IL})				0.8V, 1mA	
Enable High (V_{IH} ; for Pri_En & Sec_En)				12, 5	V

ORION SERIES

3.3V/5V/12V/15V Outputs
2.45" x 2.45" x 0.5" 54W/in³ 88% Efficiency
Best-in-class, High Density DC-DC Converter Modules 36-72VDC Input, 50W to 150W

The *ORION SERIES* uses innovative circuit design and packaging techniques to provide up to 150W in half the footprint of other commercially available power converter modules without sacrificing essential features or performance. Since they incorporate all the necessary filtering, protection, and sharing circuitry in addition to having efficiencies to 88%, these modules offer the highest utilization of scarce PCB real estate in a system design compared to any other converter module available.

The *ORION SERIES* comprises a core product in Galaxy Power's offering of *Real Solutions for Distributed Power Architectures* - a range of power conversion solutions that are specifically designed to meet the needs of the system designer.

General Features

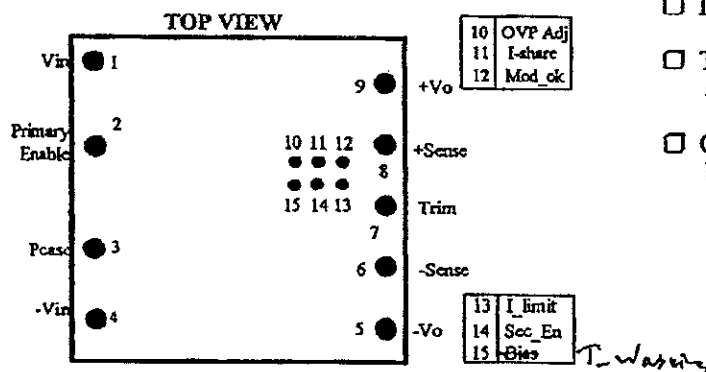
- ☐ Full 150 Watts (30A) at 5 Vout
- ☐ Meets UL, CSA, VDE, BABT requirements
- ☐ Fixed-frequency Operation
- ☐ Accurate current-sharing with built-in fail-safe feature
- ☐ Internal common-mode and differential mode filtering - module meets VDE0871 Class A and CISPR input noise limits
- ☐ MTBF: 1,000,000 hours (MIL-STD-217)
- ☐ Six-side EMI shield
- ☐ Fast transient response

Control Features

- ☐ Primary- and Secondary-Referenced Enable inputs
- ☐ Pin-programmable output voltage
5V → 3.3V, 3.3 → 2.1V, 12V → 9V
- ☐ Remote-sense allows application in N+1 redundant configurations
- ☐ Adjustable current limit
- ☐ Module OK signal
- ☐ Adjustable OVP limit
- ☐ Output voltage trim

Protection Features

- ☐ Latching Over-Voltage Protection
- ☐ True "brick-wall" current limiting with automatic recovery
- ☐ Over-temperature protection at 110°C base-plate temperature

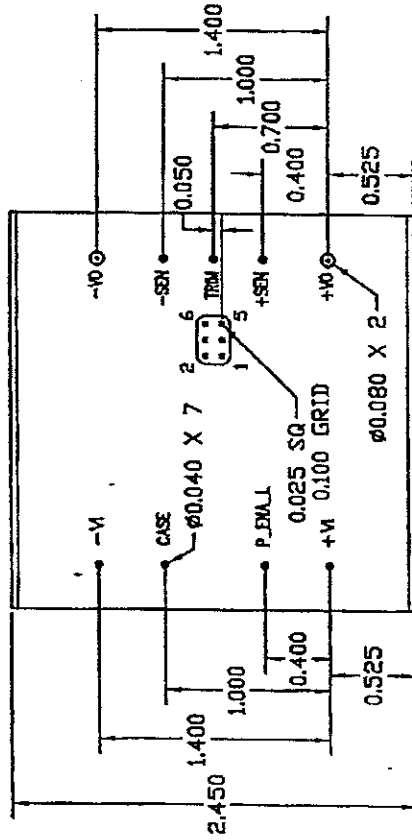


**GALAXY
POWER**

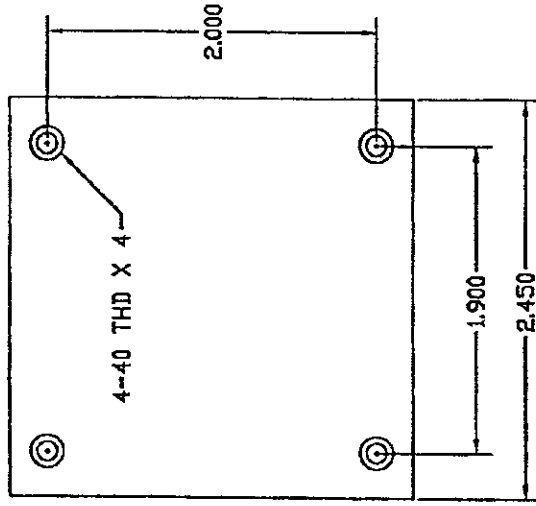
Real Solutions for Distributed Power

DIMENSIONS AND PINOUT

BOTTOM VIEW



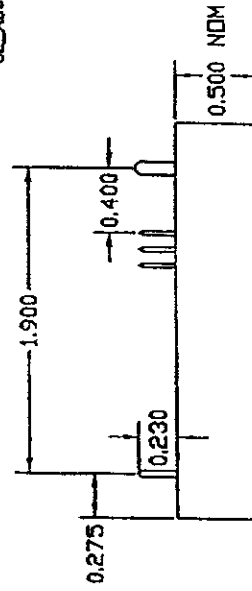
TOP VIEW



DETAIL SEC SIDE
CONTROL SIG CONN

TEMP_WARN_L 1 2 OVP_ADJ
S_ENA_L 3 4 I_SHARE
CL_ADJ 5 6 MOD_OK_L

SIDE VIEW



STAR SERIES

2.45" x 4.8" x 0.5"

3.3V/5V/12V/15V Outputs

34W/in³ 87% Efficiency**High Density DC-DC Converter Modules 36-72VDC Input, 100W to 200W**

General Features

- ☐ High Efficiency (>84% @Vo = 5.0V)
- ☐ Fixed-frequency Operation
- ☐ Accurate current-sharing with built-in fail-safe feature
- ☐ Internal Common-mode and differential mode filtering
- ☐ MTBF: 1,000,000 hours (MIL-STD-217)
- ☐ Meets UL, CSA, VDE, BABT requirements
- ☐ Fast transient response
- ☐ Latching Over-Voltage Protection
- ☐ True "brick-wall" current limiting with automatic recovery

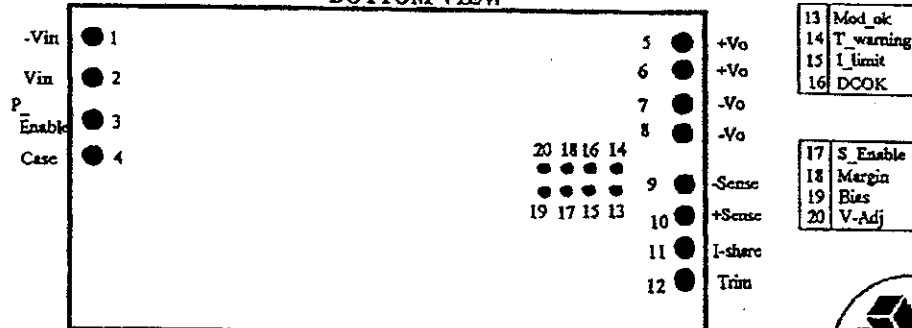
The *STAR SERIES* is the superior solution to the 200W power component industry workhorse. Unlike other commercially available modules, this series comes with ALL the necessary control and status signals required to use power component modules successfully in any electronic system. With a high-efficiency, high-reliability design that incorporates on-board input filtering, the *STAR SERIES* is the most cost-effective solution for Distributed Power Architectures.

Control Features

- ☐ Primary- and Secondary-Referenced Enable inputs
- ☐ Current-Share and Remote-sense makes application in parallel and N+1 redundant configurations easy
- ☐ Adjustable current limit
- ☐ Module OK signal
- ☐ Output voltage trim

PRELIMINARY

BOTTOM VIEW

**GALAXY
POWER***Real Solutions for Distributed Power*

Galaxy Power Real Solutions for Distributed Power Architectures STAR SERIES Rev. 103
INPUT SPECIFICATIONS

Parameter	Symbol	Min	Typical	Max	Units
Operating Input Voltage	V_i	36	48	72	VDC
Inrush Current	I_{inrush}			8	A pk
Inrush transient	$i^{\dagger t}$			4	A's
Input Ripple Rejection (120 Hz)			60		dB
No-load input Power			1.5	2	W

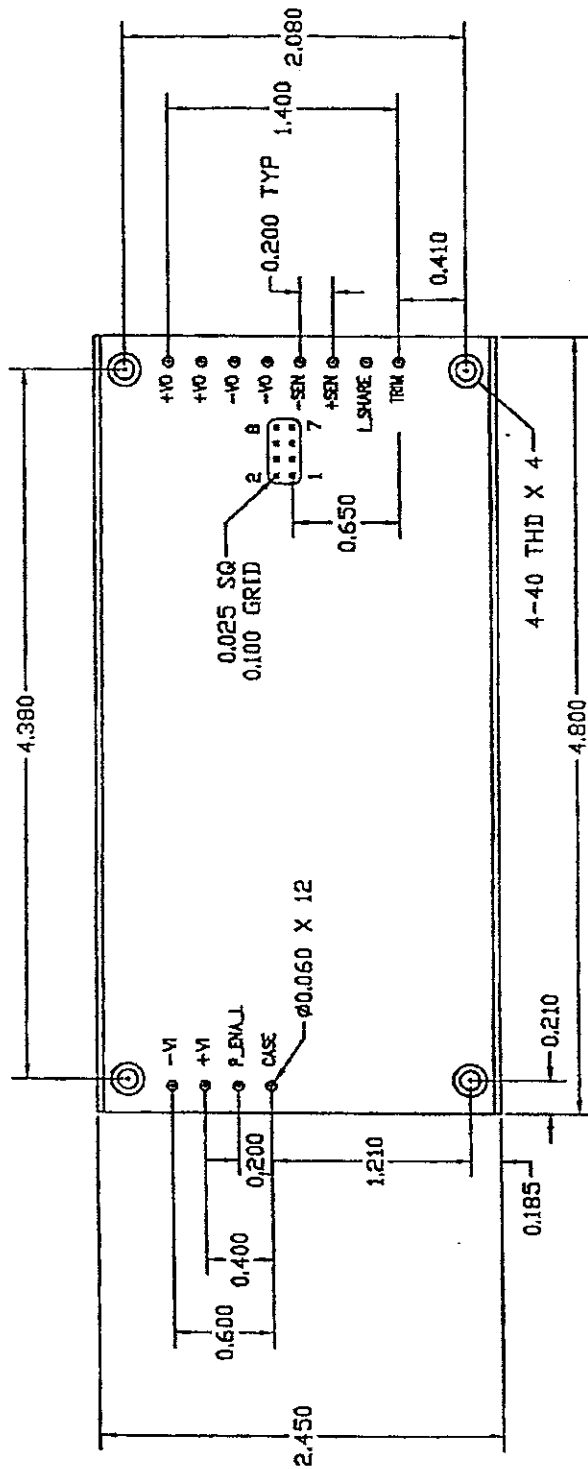
OUTPUT SPECIFICATIONS

Parameter	Symbol	Min	Typical	Max	Units
VOLTAGE	V_o		3.3, 5.0 12.0, 15.0		Volts
Total Regulation (Load, line, initial, drift, temp)				+/- 2.5	% $V_{o,nom}$
Output Voltage Set point ($V_i = 48V$, $I_o = \text{full load}$, $T_c = 25^\circ C$)	$V_{o,set}$	99	100	101	% $V_{o,nom}$
Output Regulation Line ($V_i = 38V$ to $60V$)			0.05	0.1	%
Load ($I_o = 0A$ to $I_{o,max}$)			0.1	0.2	%
Temp. ($T_c = 0^\circ C$ to $100^\circ C$)			0.2	1.0	%
Output Ripple & Noise Voltage RMS				3.3V 5.1V 12V 15V 35 50 100 120	mV rms
Peak-to-peak (5 Hz to 20 Mhz)				100 100 120 150	mV pk-pk
V_o Margin Range ($V_o = V_{o,nom}$; $I_o = I_{o,max}$)	V_m		-35%, +30%		% V_o
Remote Sense Compensation				0.5	V

CURRENT	Symbol	Min	Typical	Max	Units
Output Current	I_o			100W 125W 150W 200W 30 35 40 40 20 30 40 8 12 16 6.7 10 13	A
3.3V output		0			
5.0V output					
12.0V output					
15.0V output					
Dynamic Response ($V_i = 48V$) Load change: 25% to 75% I_{max} ($di/dt = 0.1A/\mu s$)					
Peak deviation				+/-3	% $V_{o,nom}$
Settling time (to 1% V_o)			100	150	μsec
Current-sharing, Module-module @90% I_{max}			5	15	% I_{avg}

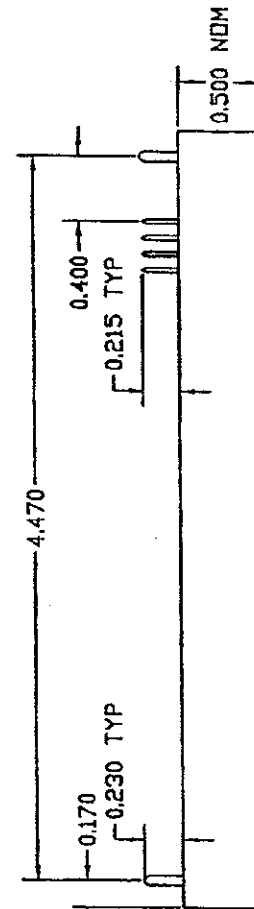
PROTECTION					
Nominal Current Limit ($V_{out} = 90\% V_o$)		105	110	120	% $I_{o,max}$
Output Short-circuit current limit			130	150	% $I_{o,max}$
Over-voltage Shutdown	V_{sd}	120	125	130	% $V_{o,nom}$
MISCELLANEOUS					
Turn-on time from enable (resistive load) ($V_i = 60V$, $I_o = I_{max}$)			10	15	ms
Isolation capacitance (500VDC)			3,000		pF
Isolation Resistance (500VDC)		10			Mohms
Operating Baseplate Temperature		-20		90	degC
Overtemperature shutdown (TBaseplate)		105	110	120	degC
Enable Low (V_{IL} , I_{IL})				0.9V, 1mA	
Enable High (V_{IH} ; for Pri_En & Sec_En)				12, 5	V

DIMENSIONS AND PINOUT BOTTOM VIEW



DETAIL SEC SIDE CONTROL SIG CONN

SYNC 1 2 OVP_ADJ
 S_ENA_L 3 4 CL_ADJ
 L_MON 5 6 V_ADJ
 MOD_OK_L 7 8 TEMP_WARN_L



PEGASUS SERIES

2.45" x 4.6" x 0.5" 3.3V/5V/12V/15V Outputs 54W/in³ 87% Efficiency

High Density DC-DC Converter Modules 36-72VDC Input, 200W to 300W

The *PEGASUS SERIES* uses innovative circuit design and packaging techniques to provide up to 300W in output power. This series comes with ALL the necessary control and status signals required to use power component modules successfully in any electronic system. With a high-efficiency, high-reliability design that incorporates on-board input filtering, the *PEGASUS SERIES* is the most space-efficient solution for Distributed Power Architectures.

General Features

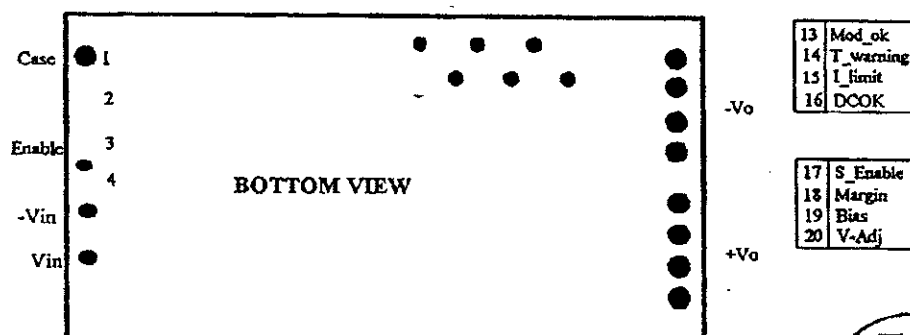
- ☐ Full 300 Watts (60A @ 5V out).
- ☐ Fixed-frequency Operation
- ☐ Accurate current-sharing with built-in fail-safe feature
- ☐ Internal Common-mode and differential mode filtering - module meets VDE0871 Class A and CISPR input noise limits
- ☐ MTBF: 1,000,000 hours (MIL-STD-217E)
- ☐ Meets UL, CSA, VDE, BABT requirements
- ☐ Fast transient response
- ☐ Six-sided EMI shield

Control and Monitoring Features

- ☐ Primary- and Secondary-Referenced Enable inputs
- ☐ Current-Share and Remote-sense makes application in parallel and N+1 redundant configurations easy
- ☐ Adjustable current limit
- ☐ Thermal shutdown warning
- ☐ Module OK signal
- ☐ Programmable output voltage

Protection Features

- ☐ Latching Over-Voltage Protection
- ☐ True "brick-wall" current-limiting with automatic recovery
- ☐ Over-temperature protection at 110C base-plate temperature



**GALAXY
POWER**

Real Solutions for Distributed Power

GALAXY POWER Real Solutions for Distributed Power Architectures DC/DC CONVERTERS Rev. x01
INPUT SPECIFICATIONS

Parameter	Symbol	Min	Typical	Max	Units
Operating Input Voltage	V_i	36	48	72	VDC
Inrush Current	I_{inrush}			8	A pk
Inrush transient	i^2t			4	A ² s
Input Ripple Rejection (120 Hz)			60		dB
No-load input Power			2	3	W

OUTPUT SPECIFICATIONS

Parameter	Symbol	Min	Typical	Max	Units
VOLTAGE					
Initial Setting	$V_{o,set}$		3.3, 5.0 12.0, 15.0		Volts
Total Regulation (Load, line, initial, drift, temp)				+/- 3	% $V_{o,nom}$
Output Voltage Set point ($V_i = 48V$, $I_o = \text{full load}$, $T_c = 25^\circ C$)	$V_{o,set}$	99	100	101	% $V_{o,nom}$
Output Regulation Line ($V_i = 38V$ to $60V$)			0.1	0.3	%
Load ($I_o = 0A$ to $I_{o,max}$)			0.1	0.5	%
Temp. ($T_c = 0^\circ C$ to $100^\circ C$)			0.4	0.8	%
Output Ripple & Noise Voltage RMS				3.3V 5.1V 12V 15V 35 35 50 65	mV rms
Peak-to-peak (5 Hz to 20 Mhz)				100 100 150 150	mV pk-pk
V_o Margin Range ($V_o = V_{o,nom}$; $I_o = I_{o,max}$)	V_m		-35%, +20%		% V_o
Remote Sense Compensation				0.6	V

CURRENT	Symbol	Min	Typical	Max	Units
Output Current				200W 300W	
3.3V output	I_o	0		60	A
5.0V output				40 60	
12.0V output				17 25	
15.0V output				13.3 20	
Dynamic Response ($V_i = 48V$) Load change: 25% to 75% I_{max} ($di/dt = 0.1A/\mu s$) Peak deviation Settling time (to 1% V_o)			3.3V, 5V/ 12V, 15V 150/450 200	3.3V 5V 12V 15V 150 150 450 450 250	% $V_{o,nom}$ μsec
Current-sharing, Module-module @90% I_{max}			3	10	% I_{avg}

PROTECTION					
Nominal Current Limit ($V_{out} = 90\% V_o$)		105	110	120	% $I_{o,max}$
Output Short-circuit current limit			130	150	% $I_{o,max}$
Over-voltage Shutdown	V_{sd}	120	125	130	% $V_{o,nom}$
MISCELLANEOUS					
Turn-on time from enable (resistive load) ($V_i = 60V$, $I_o = I_{max}$)			10	15	ms
Isolation capacitance (1500VDC)			3,000		pF
Isolation Resistance (1500VDC)		10			Mohms
Operating Baseplate Temperature		-20		90	degC
Overtemperature shutdown ($T_{Baseplate}$)		105	110	120	degC
Enable Low (V_{IL} , I_{IL})				0.8V, 1mA	
Enable High (V_{IH} ; for Pri_En)				12	V
Enable High (V_{IH} ; for Sec_En)		0		2.8V (TTL compatible)	

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VLT, Inc., *
Plaintiff, *
v. * CIVIL ACTION
* NO. 01-10238-PBS
*
Artesyn Technologies Inc., *
Artesyn North America, Inc., *
Artesyn International Ltd., *
Artesyn Ireland Ltd., *
Artesyn Austria GmbH & Co. KG, *
Defendants. * DEMAND FOR JURY TRIAL

AMENDED COMPLAINT

Plaintiff, VLT, Inc. ("VLT"), as and for its Amended Complaint against defendants, Artesyn Technologies Inc., Artesyn North Ameica, Inc., Artesyn International Ltd., Artesyn Ireland Ltd., and Artesyn Austria GmbH & Co. KG (collectively "Artesyn"), states as follows:

1. Plaintiff brings this patent infringement action against Artesyn based upon Artesyn's unauthorized manufacture, use, importation, sale, and/or offer for sale of products that infringe Plaintiff's patented technology.

PARTIES

2. VLT, Inc. ("VLT") is organized under the laws of the State of California with a principal place of business at 560 Oakmead Parkway, Sunnyvale, California 94086. VLT is a wholly-owned subsidiary of Vicor Corporation.

3. Upon information and belief, Artesyn Technologies, Inc. is a corporation organized and existing under the laws of the State of Florida, with a place of business at 7900 Glades Road, Suite 500, Boca Raton, Florida 33434 and an office located at 125 Newbury Street, Suite 100, Framingham, Massachusetts 01701 and is transacting, doing and/or soliciting business and committing acts of patent infringement in this judicial district and elsewhere.

4. Upon information and belief, Artesyn North America, Inc. is a corporation organized and existing under the laws of the State of Delaware, with a place of business in Minneapolis, Minnesota and is transacting, doing and/or soliciting business and committing acts of patent infringement in this judicial district and elsewhere.

5. Upon information and belief, Artesyn International Ltd. is a corporation organized and existing under the laws of the Cayman Islands, with a place of business in Youghal, Ireland and is transacting, doing and/or soliciting business and committing acts of patent infringement in this judicial district and elsewhere.

6. Upon information and belief, Artesyn Ireland Ltd. is a corporation organized and existing under the laws of the Cayman Islands, with a place of business in Youghal, Ireland and is transacting, doing and/or soliciting business and committing acts of patent infringement in this judicial district and elsewhere.

7. Upon information and belief, Artesyn Austria GmbH & Co. KG is a partnership organized and existing under the laws of Austria, with a place of business in Vienna, Austria and is transacting, doing and/or soliciting business and committing acts of patent infringement in this judicial district and elsewhere.

JURISDICTION AND VENUE

8. This is a patent infringement action brought under the patent laws of the United States, 35 U.S.C. § 271 *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1332, and 1338.

9. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400.

COUNT I - PATENT INFRINGEMENT

10. VLT is the owner of United States Reissue Patent No. Re. 36,098 (“the ‘098 Patent”), entitled “Optimal Resetting Of The Transformer’s Core In Single Ended Forward Converters,” a valid patent that was duly and legally issued on February 16, 1999. A copy of the ‘098 patent is attached hereto as Exhibit A. The ‘098 Patent is a reissue of United States Patent No. 4,441,146, which was duly and legally issued on April 3, 1984.

11. VLT is the assignee and licensor of the ‘098 Patent. Vicor Corporation (“Vicor”) is the former assignee of and is a licensee under the ‘098 Patent.

12. Vicor designs, develops, manufactures, markets and sells modular power components and complete power systems for use in converting electric power into a form suitable for use by electronic circuitry. Power converters are required in virtually all electronic products (e.g., personal computers) because commonly available electrical energy sources, such as a wall outlet, cannot typically provide the stabilized, constant, and relatively low values of direct current (“DC”) voltage needed by most electronic components (e.g., microprocessors; silicon integrated circuits).

13. Vicor was founded in Massachusetts in 1981 by Dr. Patrizio Vinciarelli. Dr. Vinciarelli and Vicor have developed families of standardized modular power converters that are smaller and more energy efficient than power converters using alternative technologies.

14. Vicor's power supply products have achieved widespread acceptance in the electronics industry. Vicor is an acknowledged leader in the fields of power conversion, power product design and automated manufacturing. Vicor has received many honors in the business and technical press.

15. Artesyn Technologies Inc. is engaged in the manufacture, use, sale and/or offer for sale of electronic power converters with reset circuits which fall within one or more of the claims of the '098 Patent ("Artesyn's Power converters") in this district and elsewhere in the United States.

16. Artesyn North America, Inc. is engaged in the manufacture, use, sale and/or offer for sale of electronic power converters with reset circuits which fall within one or more of the claims of the '098 Patent ("Artesyn's Power converters") in this district and elsewhere in the United States.

17. Artesyn International Ltd. is engaged in the manufacture, use, sale and/or offer for sale of electronic power converters with reset circuits which fall within one or more of the claims of the '098 Patent ("Artesyn's Power converters") in this district and elsewhere in the United States.

18. Artesyn Ireland Ltd. is engaged in the manufacture, use, sale and/or offer for sale of electronic power converters with reset circuits which fall within one or more of the claims of the '098 Patent ("Artesyn's Power converters") in this district and elsewhere in the United States.

19. Artesyn Austria GmbH & Co. KG is engaged in the manufacture, use, sale and/or offer for sale of electronic power converters with reset circuits which fall within one or more of the claims of the '098 Patent ("Artesyn's Power converters") in this district and elsewhere in the United States.

20. By its manufacture, use, sale and/or offer for sale of Artesyn's Power converters, Artesyn Technologies Inc., Artesyn North America, Inc., Artesyn International Ltd., Artesyn Ireland Ltd. and Artesyn Austria GmbH & Co. KG have infringed and continue to infringe one or more claims of the '098 Patent. See Exhibit B, Memorandum and Order, dated January 24, 2001, in *VLT Corporation and Vicor Corporation v. Unitrode Corporation*, 98-cv-11152-PBS, at 12.

21. Artesyn's acts of infringement have been and are being performed with Artesyn's knowledge that Artesyn's Power converters infringe the '098 Patent. These acts of infringement constitute a willful infringement of the '098 Patent.

22. Artesyn's acts of infringement have caused reparable and irreparable damage to VLT and VLT will continue to suffer damage unless Artesyn is enjoined.

RELIEF

WHEREFORE, by reason of the foregoing, VLT respectfully requests that the Court:

- A. Enter judgment that Artesyn Technologies Inc., Artesyn North America, Inc., Artesyn International Ltd., Artesyn Ireland Ltd., and Artesyn Austria GmbH & Co. KG have infringed the '098 Patent;
- B. Enter judgment that Artesyn Technologies Inc.'s, Artesyn North America, Inc.'s, Artesyn International Ltd.'s, Artesyn Ireland Ltd.'s, and Artesyn Austria GmbH & Co. KG's acts of patent infringement are willful;
- C. Order Artesyn Technologies Inc., Artesyn North America, Inc., Artesyn International Ltd., Artesyn Ireland Ltd., and Artesyn Austria GmbH & Co. KG to account for and pay to VLT all damages, including lost profits and interest thereon, caused to VLT by defendant's unlawful acts aforesaid;

- D. Award VLT increased damages pursuant to 35 U.S.C. § 284;
- E. Award VLT its interest, costs, and attorneys' fees incurred in this action; and
- F. Grant VLT such other and further relief as the Court may deem just and proper.


JURY TRIAL DEMAND

VLT demands a trial by jury on all issues so triable raised herein.

Respectfully submitted,

VLT, Inc.

By its attorneys,


Paul F. Ware, Jr., P.C. (BBO # 516240)
Douglas C. Daskocil (BBO # 558949)
Daryl L. Wiesen (BBO # 634872)
GOODWIN PROCTER LLP
Exchange Place
53 State Street
Boston, MA 02109
(617) 570-1000

Dated: February 25, 2002

LIBA/1138004.1

